

PORTLAND GENERAL ELECTRIC COMPANY
EUGENE WATER & ELECTRIC BOARD
AND
PACIFIC POWER & LIGHT COMPANY

TROJAN NUCLEAR PLANT

Operating License NPF-1
Docket 50-344
License Change Application 77

This License Change Application is submitted to reflect changes in the Trojan Nuclear Plant and corporate organizations, and requests deletion of the requirements in Technical Specifications 6.5.1.6.i and 6.5.1.6.j contained in Appendix A to Operating License NPF-1 for the Plant Review Board to submit recommended changes to the Emergency Plan, Security Plan or implementing procedures to the Chairman of the Nuclear Operations Board. A typographical error on Figure P 3/4.4-2 in Appendix A is also corrected.

PORTLAND GENERAL ELECTRIC COMPANY

By *B. Withers*
Bart D. Withers
Vice President
Nuclear

Subscribed and sworn to before me this 16th day of July 1981.

Carole A. Hodgdon
Notary Public of Oregon

My Commission Expires: August 9, 1983

LICENSE CHANGE APPLICATION 77

The proposed replacement pages to Appendix A of Facility Operating License NPF-1 are provided as Attachment 1. A description of these changes follows:

1. Page 6-2. Figure 6.2-1 has been revised to reflect proposed changes to the Offsite Organization. The number of personnel who report directly to the Vice President Nuclear has been reduced. As shown on the proposed Figure 6.2-1, the Trojan Nuclear Plant General Manager and the Nuclear Maintenance and Construction Manager will report to the Assistant Vice President Nuclear. The Manager of Generation Licensing and Analysis will report to the General Manager of Technical Functions. Other positions currently in Figure 6.2-1 of the Technical Specifications which are not relevant to the operation of the Trojan Nuclear Plant have been deleted.
2. Page 6-3. Figure 6.2-2 is revised to add several intermediate supervisors. The following is a brief summary of each new position:
 - a. Control and Electrical Supervisor - Reports to the Maintenance Supervisor and is responsible for the supervision of the Instrument and Control Supervisor, Electrical Foremen and technicians, and for the proper operation, maintenance testing and adjustment of all instrumentation, control, and electrical equipment.
 - b. Radwaste Supervisor - Reports to the Radiation Protection Supervisor and is responsible for radioactive material control.
 - c. Assistant Shift Supervisors - Will report to the respective Shift Supervisors and assist the Shift Supervisors in their duties. This position will be in effect by July 1982.
3. Page 6-7. Section 6.5.1.7, Paragraphs (i) and (j) delete the requirement for the Plant Review Board to submit recommended changes for the Security Plan, Emergency Plan, and implementing procedures to the Chairman of the Nuclear Operations Board.
4. Page 6-9. Section 6.5.2.2 is revised by designating the General Manager Technical Functions as Chairman of the Nuclear Operations Board (NOB). Also, the title "Health Physicist" has been changed to read "Designated Health Physicist".

5. Page B 3/4 4-7. A typographical error is corrected on Figure B 3/4.4-2 by changing the line that presently reads as "CU% 0.15 BASE, 1.10 WELD" to "CU% 0.15 FASE, 0.10 WELD".

REASON FOR CHANGE

Figures 6.2-1 and 6.2-2 and Section 6.5.2.2 have been revised to reflect proposed changes in the Trojan Nuclear Plant and corporate organizational structures. The realignment of reporting and responsibility shown here will result in an organization that functions more efficiently. This revision to Figures 6.2-1 and 6.2-2 does not delete any positions related to the operation of the Trojan Nuclear Plant presently required by the Technical Specifications, but represents the addition of intermediate supervisors and a reordering of reporting responsibility. Since the Assistant Vice President Nuclear has been placed in the operational reporting chain for the Trojan Nuclear Plant, Section 6.5.2.2 has been changed by specifying the General Manager Technical Functions as the Chairman of the NOB and so ensures that the NOB remains an independent review organization.

Section 6.5.1.6.j of the Technical Specifications states that the Plant Review Board (PRB) shall be responsible for reviewing the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the NOB; however, Section 6.5.2.7 of the Technical Specifications does not require the NOB to review these changes. A similar situation exists in Section 6.5.1.6.i in regards to the Security Plan. The proposed changes in Section 6.5.1.6 correct these discrepancies by deleting the requirements in Section 6.5.1.6.i and 6.5.1.6.j for the PRB to submit these documents to the Chairman of the NOB since the present review chain, which extends through the PRB, is sufficient to determine the suitability of any proposed revisions or implementing procedures, and further review by the NOB is not necessary.

Figure B 3/4.4-2 is modified to correct a typographical error.

SAFETY/ENVIRONMENTAL EVALUATION

Summary of Change

As shown in Attachment 1 and described in Reason for Change, Figures 6.2-1 and 6.2-2 of Appendix A have been altered to reflect proposed changes in the Offsite and Facility Organizations. Section 6.5.2.2 is revised by designating the General Manager Technical Functions as Chairman of the NOB, and Section 6.5.1.6 is changed by deleting the requirement for the PRB to submit recommended changes to the Security Plan, Emergency Plan or implementing procedures to the Chairman of the NOB. A typographical error in Figure B 3/4.4-2 is corrected.

Effect on Technical Specifications
Effect on Bases for Technical Specifications

The Technical Specifications are affected only as shown in Attachment 1. The Bases for the Technical Specifications are not affected except as noted on Figure B 3/4.4-2.

The revised organizations shown in Attachment 1 remain consistent with the guidelines of ANSI N18.7-1976/ANS 3.2 and Regulatory Guide 1.33, and the minimum educational and experience requirements for personnel filling key management and technical positions remain unchanged. This establishment of intermediate supervisors and realignment of reporting responsibilities will reduce the supervisory and administrative burden on the senior managers and should result in an organization that is more effective and efficient in dealing with required tasks.

The General Manager Technical Functions replaces the Assistant Vice President Nuclear as Chairman of the NOB. This organizational change ensures that the NOB continues to remain an independent review group.

The corrections to Section 6.5.1.6 are administrative in nature. Changes to the subject documents, along with the associated implementing procedures, receive a careful review by the appropriate departments and by the PRB, and further review by the NOB is not always necessary. If the PRB should determine, in some cases, that the NOB should review a revision to the Emergency Plan or Security Plan, then the PRB does have the option of forwarding it for further review; however, it is not appropriate for the PRB to forward all such revisions and implementing procedures to the NOB. Furthermore, safety evaluations for changes are evaluated by the NOB pursuant to Technical Specifications 6.5.2.7a and b, and the Security and Emergency Plans are audited periodically by the NOB in accordance with Technical Specifications 6.5.2.8e and f.

The alteration to Figure B 3/4.4-2 corrects a typographical error and, as such, does not affect any other Bases for the Technical Specifications.

These revisions in no way involve a decrease in any safety margins, and the health and safety of the public will not be endangered due to operation in this proposed manner.

Effect on FSAR

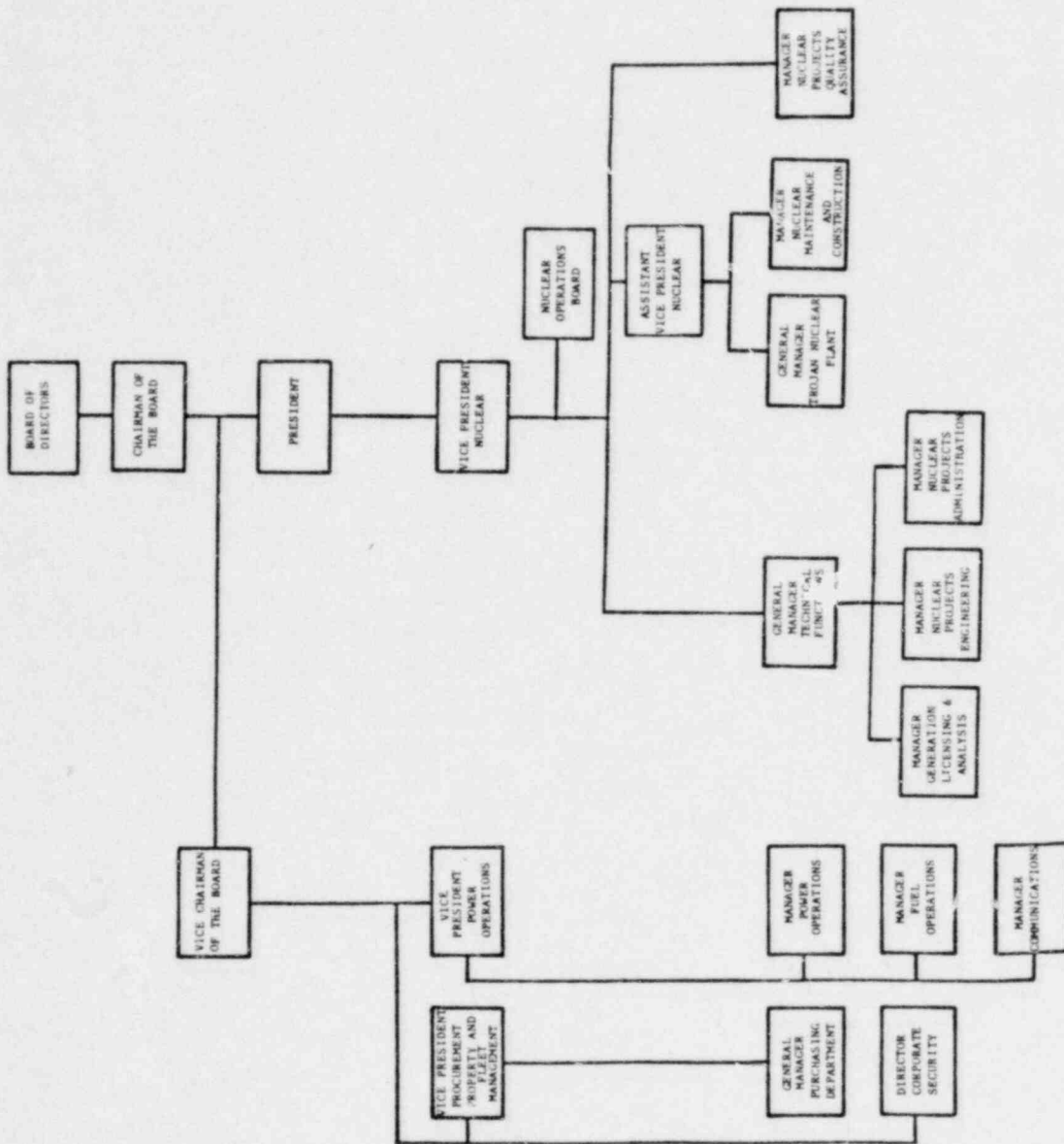
Section 13.1 of the FSAR will be affected by the organizational changes, and the FSAR will be updated in the future to incorporate this information. No other changes to the FSAR will be necessary.

Environmental Effect

The proposed changes will not affect effluent types or alter any discharge limits. No unreviewed environmental matter exists, and there will be no impact to the environment from this change.

Basis for Determination of Amendment Class

This License Change Application has been determined to result in a Class II amendment in accordance with the criteria of 10 CFR 170.22. The proposed changes are administrative in nature and do not affect any safety or environmental evaluations.



Offsite Organization

Figure 6.2-1

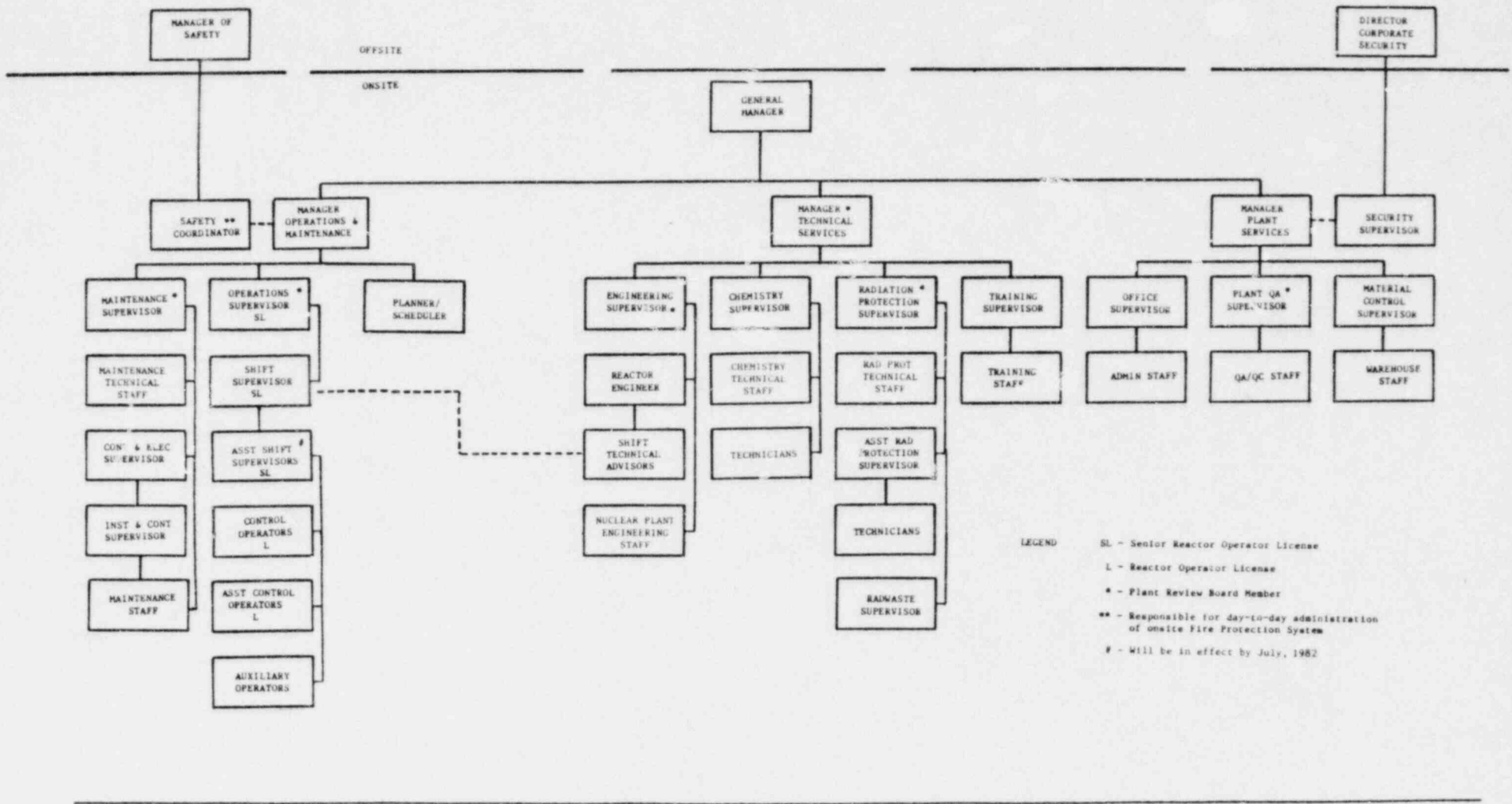


Figure 6.2-2 Facility Organization

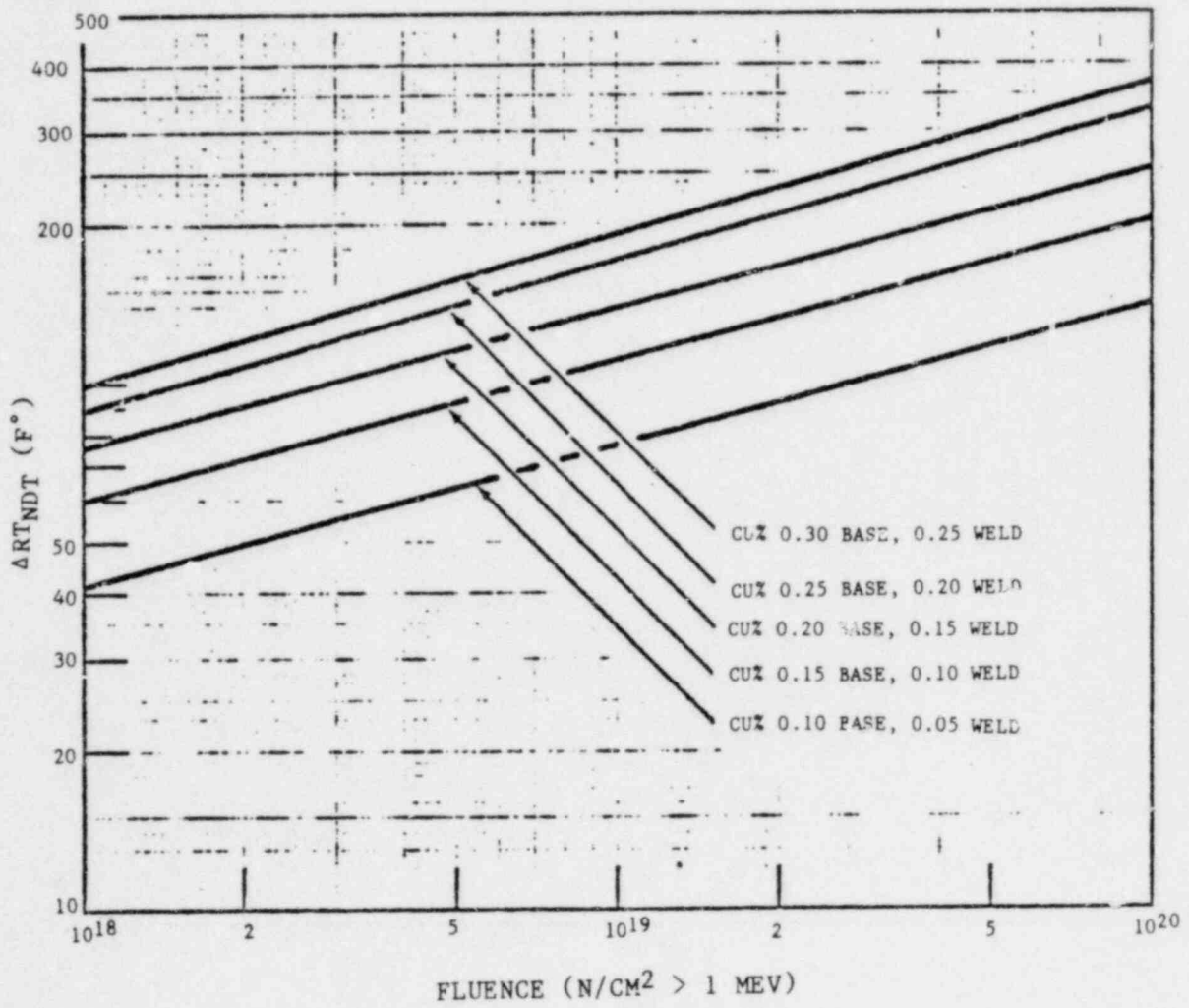


Figure B 3/4.4-2

Effect of Fluence and Copper Content on Shift of RT_{NDT} for Reactor Vessels Exposed to $550^\circ F$ Temperature